

FILED  
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

NOV 2 2005 A 11:40  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

SHEILA PORTER,

Plaintiff

V.

ANDREA CABRAL, SUFFOLK  
COUNTY SHERIFF'S DEPARTMENT,  
SUFFOLK COUNTY, and  
CORRECTIONAL MEDICAL  
SERVICES, INC.

Defendants

Civil Action No. 04-11935-DPW

**PLAINTIFF SHEILA PORTER'S MOTION TO IMPOUND  
HER MOTION TO COMPEL DEPOSITION PREPARATION  
MATERIALS FROM SUFFOLK COUNTY SHERIFF'S DEPARTMENT**

NOW COMES Sheila Porter ("Mrs. Porter"), by her undersigned counsel, and requests, pursuant to Local Rule 7.2, that the Court impound Mrs. Porter's Motion to Compel Deposition Preparation Materials from the Suffolk County Sheriff's Department and the accompanying Affidavit of David S. Schumacher. As grounds therefore, Mrs. Porter states that these pleadings contain information and documents that the defendants have designated as confidential under the Protective Order governing this case. Mrs. Porter is aware that, pursuant to the Protective Order, as modified by the Court, the parties are required to show good cause for filing a document under seal. Mrs. Porter does not believe that there is good cause for filing the instant Motion and Affidavit under seal, but she does so in order to remain in compliance with the Protective Order

until otherwise ordered. In addition, redacted copies of these pleadings are being filed electronically on the public docket. Mrs. Porter requests that these materials be impounded until further order of the court.

Respectfully Submitted

SHEILA J. PORTER

By her attorneys,

A handwritten signature in black ink, appearing to read 'JSavage', is written over a horizontal line.

Joseph F. Savage Jr. (BBO #443030)  
David S. Schumacher (BBO #647917)  
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617.570.1000

Dated: November 2, 2005

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